

# AMENDED

## CORRECTIVE ACTION PLAN

### With TRANSITION PLAN

# Spring Creek Apartments

320 Homestead Parkway  
Longmont, CO 80504



For: Housing Authority of the City of Longmont  
350 Kimbark Street  
Longmont, CO 80501

ADA Compliance by Whiteley Consulting, LLC  
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March 10, 2022  
Amended January 13, 2023



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## EXECUTIVE SUMMARY

### BACKGROUND

On January 18, 2022, a representative of ADA COMPLIANCE by Whiteley Consulting, LLC undertook a physical accessibility survey of the Spring Creek Apartments located at 320 Homestead Parkway in Longmont, Colorado. Exterior and interior common use areas and the designated dwelling units for persons with mobility impairment were surveyed for conformance with the Uniform Federal Accessibility Standards (UFAS.) In addition, the covered dwelling units for persons with mobility impairment were surveyed for conformance with the design and construction requirements of the Fair Housing Act. Photographs and measurements were taken of potential non-compliance items in accordance with the UFAS and the Fair Housing Act.

### ITEMS NOT IN COMPLIANCE

Based on the field measurements and the review of the UFAS and the Fair Housing Act, a number of items were found to be non-compliant with the UFAS and the Fair Housing Act. These items are summarized in the Needs Assessment section.

### ESTIMATED CONSTRUCTION COSTS

Based on current construction industry standards, and the latest labor rates, the estimated construction costs to address the non-compliant items surrounding and within The Spring Creek Apartments is \$13,420.00. Architectural Design services and contingency is not included. A transition plan to address the non-compliant items to be distributed over the next seven (7) calendar years is included in the Needs Assessment and Transition Plan section of this report.

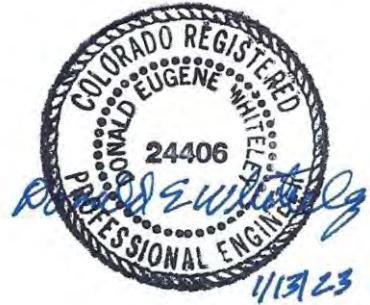
## CERTIFICATION

I have surveyed the exterior and interior common use areas and the designated dwelling units for compliance with the UFAS and the design and construction requirements of the Fair Housing Act

***ADA Compliance by Whiteley Consulting, LLC***

*Donald E Whiteley*

Donald E. (Leo) Whiteley, P.E., ASSOC AIA, LEED AP  
President



## INTRODUCTION

### UFAS AND THE FAIR HOUSING ACT COMPLIANCE

The Housing Authority of the City of Longmont (LHA) owns, operates, or controls a public housing program, consisting of housing and non-housing programs that includes, but is not limited to: common entrances, management offices, laundry rooms, common areas, corridors, hallways, elevators, and community programs. LHA receives federal financial assistance from the U.S. Department of Housing and Urban Development (HUD) through the Office of Public and Indian Housing (PIH) to fund its low-income public housing program, Section 8 Housing Choice Voucher (HCV) Program, and Capital Fund Program. LHA uses HUD's financial assistance to operate and maintain its low-income public housing and Section 8 programs, and to make capital improvements to LHA properties.

Based on a review of LHA's properties, a Voluntary Compliance Agreement was entered into to address the issues raised in the Department's Letter of Findings and to ensure compliance with its responsibilities under Section 504, and the implementing regulations. The physical accessibility survey of LHA's properties is to utilize the Uniform Federal Accessibility Standards (UFSA) and the design and construction requirements of the Fair Housing Act. Based on the survey of the LHA's properties per the UFSA and the Fair Housing Act, a Corrective Action Plan is to be developed to set out how the LHA will remedy the UFAS and Fair Housing Act deficiencies identified in the physical accessibility survey.

This amended report addresses both the Needs Assessment portion of the Corrective Action Plan, along with the Transition Plan, and contains the following information:

1. the specific action the LHA will take to address all UFAS and Fair Housing Act deficiencies in each unit and related common areas.
2. Estimated cost of modifications and/or acquisitions.

Based on the Needs Assessment portion of the Corrective Action Plan, the Transition Plan has been developed to address in detail the proposed efforts to make LHA's housing programs accessible to and usable by individuals with disabilities.

## SECTION 504; 24 C.F.R. §§ 8.22 AND 8.23

### **§ 8.22 - New construction - housing facilities.**

...a minimum of five percent of the total dwelling units or at least one unit in a multifamily housing project, whichever is greater, shall be made accessible for persons with mobility impairments... An additional two percent of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments.

### **§ 8.23 Alterations of existing housing facilities.**

...Once five percent of the dwelling units in a project are readily accessible to and usable by individuals with mobility impairments, then no additional elements of dwelling units, or entire dwelling units, are required to be accessible under this paragraph...

## PERCENTAGE CALCULATIONS

The percentage calculations to determine the number of units for both persons with mobility impairments and persons with hearing or vision impairments is based on the total number of dwelling units managed by the Longmont Housing Authority. LHA manages nine (9) apartment buildings with a total of 462 dwelling units. Thirty-one (31) of these dwelling units are designated and designed for persons with mobility impairments, which results in a percentage of 6.7%.

- ❖ For the Spring Creek Apartments, the following units have been designated for persons with mobility impairment:

Dwelling Unit 119 – 2 bedrooms.

Dwelling Unit 201 – 2 bedrooms.

Dwelling Unit 212 – 1 bedroom.

Dwelling Unit 309 – 1 bedroom.

No additional dwelling units for persons with mobility impairments need to be provided for the Spring Creek Apartments.

- ❖ For the Spring Creek Apartments with 60 dwelling units, 2 percent of units for persons with hearing or vision impairment =  $60 \times 0.02 = 1.2$  units. (Use 2 units)  
Presently the Spring Creek Apartments has no units designated for persons with hearing or vision impairments.

## **TRANSITION PLAN**

Transition Plans are developed to fulfill the required comprehensive planning for UFAS and Fair Housing Act compliance by identifying and planning for the removal of the items found to be non-compliant. These items are summarized in the Needs Assessment section.

Periodic updates to the Transition Plan are required in order to ensure on-going compliance with UFAS and Fair Housing Act requirements. Self-evaluation activities consisting of reviews of the Transition Plan should be undertaken to determine the level of compliance and determine if any additional areas of update are needed. If deficiencies are identified, these should be catalogued, and the Transition Plan updated to detail how and when the barriers would be removed.

In order to be effective, the Transition Plan needs to be utilized in yearly planning of projects and funding decisions, and also needs to be periodically reviewed for compliance and validity. The Transition Plan should be viewed as a “living document” and updated regularly to reflect changes in real world conditions and to address any possible areas of noncompliance. Regular updates to the plan will also result in monitoring compliance and the effectiveness of priorities set in the Plan itself.



# Spring Creek Apartments Needs Assessment with Transition Plan

UFAS §§	Heading	Requirement	Non-Conforming Description	Photo #	Recommendation	Full and Fair Cash Value for Replacement Cost (2022 Estimate)	Cost	Timeline						Complete? Insert name and date	
								Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027	Year 6 2028		Year 7 2029
4.6.3 and Fig. 9	Exterior Accessible Parking Spaces	Parking spaces for disabled people shall be at least 96" wide and shall have an adjacent access aisle 60" wide minimum.	(3) of the access aisles leading to the accessible routes are less than 60" in width.	SC #1 through SC #6	Each of the accessible parking spaces adjacent to the 3 access aisles are over 98" in width. The 2 accessible parking spaces and the access aisle should be restriped to create the 60" wide access aisles at each location.	The estimated material cost to restripe approximately 1500 square feet of the asphalt parking lot is \$50.00. The labor to rework the asphalt parking lot is approximately 2 hours for a labor cost of \$140.00. Therefore, the material and labor estimated construction cost would be \$190.00.	\$190.00								
4.2.6	Interior and Common Spaces	The maximum high side reach allowed is 54" above the floor.	The height to the top of the mail boxes is 68"	SC #7 & SC #8	<b>Residents with disabilities can request the U.S. Postal Service to accommodate their disability by assigning them a mailbox on the bottom row.</b>	No cost	\$0.00								
4.34.6.5(1) and Fig. 51	Community Kitchen - Sink	The sink and surrounding counter shall be mounted at a maximum height of 34" above the floor.	The measured distance to the top of the sink is 36"	SC #9	The top of the sink and the surrounding counters are to be lowered to be not more than 34" above the floor	The labor to lower the sink and the surrounding counters is 8 hours for a labor cost of \$560.00.	\$560.00								
4.34.6.5(8)	Community Kitchen - Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.	SC #10	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00								
4.34.5.2(4) and Fig. 47(b)	First Level Public Unisex Toilet Room Water Closets - Dispensers	Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser is approximately 41" from the back wall.	SC #11	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00								
4.22.7, 4.27, 4.2.5 and 4.2.6	Controls and Dispensers	The maximum highest operable part of all dispensers shall be 54" for a side reach.	The height to the soap dispenser is 49" above the floor.	SC #12	The soap dispenser is to be lowered to no more than 54" above the floor.	The labor to relocate the paper towel dispenser is estimated to be 1/2 hour for a labor cost of \$35.00.	\$35.00								
4.19.6 and 4.22.6	Mirrors	Mirrors shall be mounted with the bottom edge of the reflection surface no higher than 40" from the floor.	The bottom edge of the reflective surface is located 48" above the floor.	SC #13	The existing mirror is to be lowered to 40" above the floor.	The labor to relocate the existing mirror is approximately 1/2 hour for a labor cost of \$35.00.	\$35.00								
4.34.6.5(1) and Fig. 51	Sink	The sink and surrounding counter shall be mounted at a maximum height of 34" above the floor.	The measured distance to the top of the sink is 35"	SC #14	The top of the sink is to be lowered to be not more than 34" above the floor	The estimated material cost to relocate the sink is \$275.00. The labor to remove and replace the sink is approximately 12 hour for a labor cost of \$840.00. Therefore, the parts and labor estimated construction cost would be \$1,115.00.	\$1,115.00								

UFAS \$§	Heading	Requirement	Non-Conforming Description	Photo #	Recommendation	Full and Fair Cash Value for Replacement Cost (2022 Estimate)	Cost	Immediate 2022	Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027	Year 6 2028	Year 7 2029	Complete? Insert name and date
<b>Second Level Public Unisex Toilet Room</b>																
4.34.5.2(4) and 4.7(b)	Water Closets - Dispensers	Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser is approximately 43" from the back wall.	SC #15	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								
4.19.6 and 4.22.6	Mirrors	Mirrors shall be mounted with the bottom edge of the reflection surface no higher than 40" from the floor.	The bottom edge of the reflective surface is located 48" above the floor.	SC #16	The existing mirror is to be lowered to 40" above the floor.	The labor to relocate the existing mirror is approximately 1/2 hour for a labor cost of \$35.00.	\$35.00	\$35.00								
<b>Third Level Public Unisex Toilet Room</b>																
4.34.5.2(4) and 4.7(b)	Water Closets - Dispensers	Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser exceeds 36" from the back wall.	SC #17	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								
4.19.6 and 4.22.6	Mirrors	Mirrors shall be mounted with the bottom edge of the reflection surface no higher than 40" from the floor.	The bottom edge of the reflective surface exceeds 40" above the floor.	SC #18	The existing mirror is to be lowered to 40" above the floor.	The labor to relocate the existing mirror is approximately 1/2 hour for a labor cost of \$35.00.	\$35.00	\$35.00								
<b>Accessible Dwelling Unit; Guest Room #119; 2-Bedroom</b>																
4.34.5.2(4) and 4.7(b)	Water Closets - Dispensers	Starting at the edge farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser is approximately 41" from the back wall.	SC #19	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								
4.34.6.5(8)	Bathroom Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.		Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
4.34.6.5(8)	Kitchen Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.	SC #20	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
<b>Accessible Dwelling Unit; Guest Room #201; 2-Bedroom</b>																
4.34.6.5(8)	Bathroom Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.		Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
4.34.6.5(8)	Kitchen Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.		Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								

UFAS §§	Heading	Requirement	Non-Conforming Description	Photo #	Recommendation	Full and Fair Cash Value for Replacement Cost (2022 Estimate)	Cost	Immediate 2022	Year 1 2023	Year 2 2024	Year 3 2025	Year 4 2026	Year 5 2027	Year 6 2028	Year 7 2029	Complete? Insert name and date
<b>Accessible Dwelling Unit; Guest Room #212; 1-Bedroom</b>																
4.34.5.2(4) and 4.27.4(1)	Water Closets - Dispensers	Starting at the edge/farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser is approximately 41" from the back wall.	SC #21	Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								
4.22.7, 4.27, 4.2.5 and 4.2.6	Controls and Dispensers	The maximum highest operable part of all dispensers shall be 54" for a side reach.	The height to the towel rack is 59" above the floor.	SC #22	The soap dispenser is to be lowered to no more than 54" above the floor.	The labor to relocate the paper towel dispenser is estimated to be 1 1/2 hour for a labor cost of \$35.00.	\$35.00	\$35.00								
4.34.6.5(8)	Bathroom Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.		Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
4.34.6.5(8)	Kitchen Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.		Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
<b>Accessible Dwelling Unit; Guest Room #309; 1-Bedroom</b>																
4.34.5.2(4) and 4.27.4(1)	Water Closets - Dispensers	Starting at the edge/farthest from the back wall, the toilet paper dispenser is no more than 36" from the back wall.	The far reach of the toilet paper dispenser exceeds 36" from the back wall.		Relocate the toilet paper dispenser to be within 36" from back wall.	The labor to remove and relocate the existing toilet paper dispenser is approximately 2 hours for a labor cost of \$140.00.	\$140.00	\$140.00								
4.34.6.5(8)	Bathroom Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.	SC #23	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
4.34.6.5(8)	Kitchen Sink	There shall be no sharp or abrasive surfaces under sinks. Hot water and drain pipes under sinks shall be insulated or otherwise covered.	The hot water and drain piping are exposed.	SC #24	Install insulated covering over exposed piping.	The estimated material cost of the insulation covering is \$25.00. The labor to install the insulated covering is 1 1/2 hour for a labor cost of \$35.00. Therefore, the material and labor estimated construction cost would be \$60.00.	\$60.00	\$60.00								
<b>24 C.F.R. §§ 8.22 &amp; 8.23</b>																
	Dwelling Units for persons with hearing or visual impairment.	2% of 50 units = 1.2 unit (use 2 unit)	No dwelling units for persons with hearing or vision impairment have been designated.		(2) Dwelling units should be provided for persons with hearing or vision impairment.	Estimated cost to renovate (2) existing dwelling units to be acceptable for person with hearing or vision impairment is \$5,000.00 per unit for a total estimated cost of \$10,000.00	\$10,000.00			\$10,000.00						
						<b>TOTAL</b>	\$13,420.00	\$1,745.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

## PHOTO LOG – SPRING CREEK APARTMENTS

Photo SC1 – Access aisle at accessible parking spaces at south wing.



Photo SC2 – Measured width of 50" at access aisle at south wing.



Photo SC3 – Access aisle at accessible parking spaces at south wing.



Photo SC4 – Measured width of 49" at access aisle near front entrance.



Photo SC5 – Access aisle at accessible parking spaces at east wing.



Photo SC6 – Measured width of 50” at access aisle at east wing.



Photo SC7 – Mailbox bank in front lobby.



Photo SC8 – Measure height of 68” to top of mailbox bank.



Photo SC9 – Community Room - Measured height of 36" to top of sink.



Photo SC10 – Community Room – Kitchen sink with exposed piping.



Photo SC11 – First Floor Unisex Toilet Room – Measured dimension greater than 36" to toilet paper dispenser.



Photo SC12 – First Floor Unisex Toilet Room – Measured height of 49" to soap dispenser.



Photo SC13 – First Floor Unisex Toilet Room – Measured height of 48” to bottom reflective surface of mirror.



Photo SC14 – First Floor Unisex Toilet Room – Measured height of 35” to top of sink.



Photo SC15 – Second Floor Unisex Toilet Room - Measured dimension greater than 36” to toilet paper dispenser.

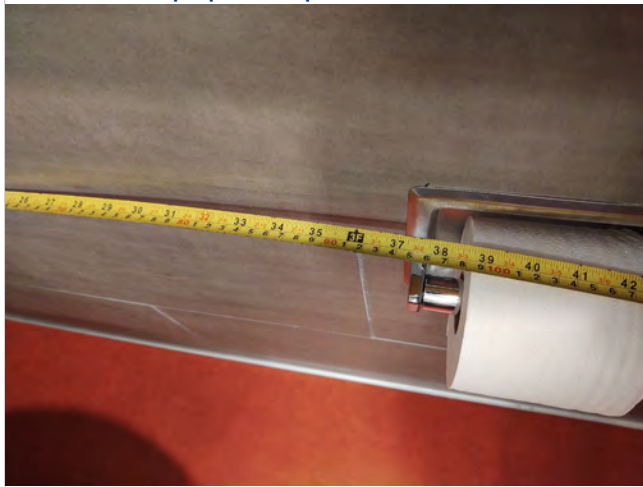


Photo SC16 – Second Floor Unisex Toilet Room – View of mirror over sink that exceeds 40”.



Photo SC17 – Third Floor Unisex Toilet Room - View of toilet paper dispenser that exceeds 36".



Photo SC18 – Third Floor Unisex Toilet Room - View of mirror over sink that exceeds 40".



Photo SC19 – Dwelling Unit #119 - Measured dimension greater than 36" to toilet paper dispenser.



Photo SC20 – Dwelling Unit #119 - Kitchen sink with exposed piping.





Photo SC21 – Dwelling Unit #212 - Measured dimension greater than 36" to toilet paper dispenser.



Photo SC22 – Dwelling Unit #212 - Measured height of 59" to towel rack.



Photo SC23 – Dwelling Unit #309 - Bathroom sink with exposed piping.



Photo SC24 – Dwelling Unit #309 - Kitchen sink with exposed piping.

